

1 **FEDERAL ELECTION COMMISSION**
2
3 **FIRST GENERAL COUNSEL'S REPORT**
4

5
6 MUR: 7250
7 DATE COMPLAINT FILED: May 24, 2017
8 DATE OF NOTIFICATION: June 1, 2017
9 LAST RESPONSE RECEIVED: July 24, 2017
10 DATE ACTIVATED: Aug. 31, 2017

11
12 ELECTION CYCLE: Special Election 2017
13 EXPIRATION OF SOL:
14 May 13, 2022 (earliest)
15 May 23, 2022 (latest)
16

17 **COMPLAINANT:**

Joe Dooling

18
19 **RESPONDENTS:**

20 Rob Quist for Montana and Linda Howard in
21 her official capacity as treasurer
22 Rob Quist
23 Montana Writers for Public Lands and Rick Bass in
24 his official capacity as treasurer
25 93 Individual Respondents

26 **RELEVANT STATUTES AND**
27 **REGULATIONS**

52 U.S.C. § 30101(4)(A)
52 U.S.C. § 30103(a)
52 U.S.C. § 30104(b), (g)
52 U.S.C. § 30116(a), (f)
52 U.S.C. § 30120(a), (c)
11 C.F.R. § 100.26
11 C.F.R. § 109.10(d)
11 C.F.R. § 109.21
11 C.F.R. § 110.11

35
36 **INTERNAL REPORTS CHECKED:**

Disclosure Reports

37
38 **FEDERAL AGENCIES CHECKED:**

None

39 **I. INTRODUCTION**

40 This matter involves a 24-page newspaper insert titled "WE TAKE OUR STAND[:]
41 Montana Writers Protecting Public Lands," disseminated in Montana newspapers four days
42 before Montana's 2017 special election for its At-Large seat in the U.S. House of

1 Representatives. The Complaint alleges that the insert, a compilation of more than 40 short
2 essays, poems, and photographs, was coordinated with candidate Rob Quist and his campaign
3 committee, Rob Quist for Montana ("Committee"), resulting in an excessive contribution to
4 both. It further alleges that the individual writers and financial backers of the insert failed to
5 register as a federal political committee, failed to disclose contributions and an independent
6 expenditure, and failed to include a proper disclaimer.

7 Montana Writers for Public Lands ("MWPL"), which registered with the Commission as
8 a political committee the day after the insert was published and two days before the complaint
9 was filed, responds that the insert was not coordinated with the Committee, and that its
10 contributors were disclosed on the insert itself and in a proper and timely report filed with the
11 Commission. MWPL acknowledges, however, that it did not timely disclose an independent
12 expenditure in connection with the insert. The Committee also denies that the insert was
13 coordinated, and the individual Respondents deny that their involvement, whether through a
14 piece of writing or a monetary donation, violated the Federal Election Campaign Act of 1971, as
15 amended (the "Act").¹

16 As set forth below, we recommend that the Commission find no reason to believe that
17 MWPL made, or that the Committee accepted, an excessive contribution in the form of a
18 coordinated communication or that MWPL failed to disclose contributors. We also recommend
19 that the Commission dismiss as a matter of prosecutorial discretion the apparent violation
20 regarding MWPL's late-filed statement of organization and the allegations that MWPL filed its
21 independent expenditure report late and that the disclaimers on the newspaper insert were

¹ Of the 93 individuals identified in the Complaint, 63 filed nearly identical responses, 14 did not respond to our notification, and another 16 could not be located and notified. In addition, two individuals who were not notified filed responses similar to the 63 Respondents.

1 incomplete.² We further recommend that the Commission find no reason to believe that the
2 individual Respondents violated the Act. We finally recommend that the Commission close the
3 file.

4 **II. FACTUAL AND LEGAL ANALYSIS**

5 **A. Facts**

6 In the run-up to the May 25, 2017, special election for the Montana U.S. House seat,³ a
7 group of individuals who describe themselves as advocates for Montana's public lands compiled
8 a 24-page collection of essays, poems, and photographs that appeared as a paid insert in three
9 Sunday newspapers in Montana on May 21, 2017.⁴ The insert references the May 25 special
10 election in several places. The introduction on the first page describes the insert as "endorsing
11 Democratic House of Representatives candidate Rob Quist's position" on the public lands issue.⁵
12 One essay, "Veterans for Rob Quist," states, "Our key battle today is to elect Rob Quist to
13 Congress."⁶ The last page states in large letters, "TAKE YOUR STAND in Montana's Special
14 Election, May 25, 2017, VOTE! Vote to Protect Montana's Public Lands!"⁷ The insert displays
15 the names of its "contributors" (writers) and "sponsors" (monetary contributors) and a website
16 address, www.wetakeourstand.org.⁸

² *Heckler v. Chaney*, 470 U.S. 821 (1985).

³ Ryan Zinke vacated the seat when he was confirmed as Secretary of the Interior in early 2017.

⁴ Compl. at 2-3 (May 24, 2017); MWPL Resp., Seabring Davis Decl. ¶ 2 (July 21, 2017).

⁵ Although the MWPL Response claims to attach the insert, it was not included.

⁶ *Id.* at 17.

⁷ *Id.* at 24.

⁸ *Id.* at 1, 3. The website address appears in small print at the bottom of every page except page 1, where it appears in the middle of the page.

1 On May 20, 2017, the day before the insert was disseminated, an article in the *Bozeman*
2 *Daily Chronicle* described the insert and included an interview with Seabring Davis, one of its
3 organizers. The article included the following statement: "The insert's distribution areas in
4 southwest and northwest Montana are places where, *consulting with the Quist campaign*, the
5 group thought they were likely to reach undecided voters, Davis said."⁹

6 On May 22, 2017, the day after the insert's publication, Davis and Rick Bass registered
7 MWPL with the Commission as a multi-candidate political committee.¹⁰ On June 24, 2017,
8 MWPL filed an Independent Expenditure Report with the Commission disclosing \$9,237 in costs
9 for the insert and also filed a 30-day Post-Election Report disclosing its receipts and
10 disbursements.¹¹ MWPL disclosed receiving a total of \$9,915 in contributions, \$5,200 of which
11 were itemized.¹² The largest contributions were three \$1,000 contributions.¹³

12 **B. Alleged Coordination**

13 Based on the newspaper article, the Complaint alleges that because the individual
14 Respondents paid for the insert and Davis and the Quist campaign "consult[ed]" on placement of
15 the insert, the insert is coordinated, resulting in an excessive, in-kind contribution by the

⁹ Eric Dietrich, *Montana Writers, Worried About Public Lands, to Publish Pro-Quist Insert*, BOZEMAN DAILY CHRONICLE (May 20, 2017) (emphasis added), https://www.bozemandailychronicle.com/news/politics/montana-writers-worried-about-public-lands-to-publish-pro-quist/article_4d9020e0-eff7-5d55-a8ff-84e8766be2ba.htmlc.

¹⁰ See MWPL Statement of Organization (May 22, 2017) <http://docquery.fec.gov/pdf/098/201705229055131098/201705229055131098.pdf>. MWPL's Statement identifies Bass as treasurer. The Complaint was filed on May 24, 2017, two days after the Committee registered with the Commission. MWPL takes responsibility for the insert in its Response. MWPL Resp. at 2.

¹¹ See <http://docquery.fec.gov/pdf/640/201706249065372640/201706249065372640.pdf> (IE Report) and <http://docquery.fec.gov/pdf/642/201706249065372642/201706249065372642.pdf> (30-Day Post-Election Report).

¹² See 30-Day Post-Election Report at 3.

¹³ See *id.* at 8.

1 individual Respondents to Quist.¹⁴ The Complaint also alleges that the insert is an “express
2 advocacy endorsement.”¹⁵

3 In a declaration MWPL submitted with its Response, Davis, who describes herself as one
4 of three organizers of MWPL and its current Assistant Treasurer, acknowledges that she spoke
5 with the newspaper reporter about the insert but attests that she did not tell the reporter that
6 MWPL had “consulted” with the Quist campaign.¹⁶ She states that she told the reporter that she
7 had discussed the publication of the insert with a Quist campaign volunteer.¹⁷ Davis explains
8 that the volunteer, Joanne Gardner, lives near her and approached her about donating to a
9 fundraising event Gardner was hosting.¹⁸ Davis attests that she mentioned to Gardner the plan to
10 distribute the insert, and Gardner suggested that it be distributed in and near Great Falls,
11 Montana.¹⁹

12 MWPL and Davis assert that Gardner did not indicate that she represented the Quist
13 campaign.²⁰ MWPL further states that it rejected Gardner’s suggestion to disseminate the insert
14 in Great Falls, and that MWPL made its decisions based on its budget and internal
15 deliberations.²¹

¹⁴ Compl. at 2-6.

¹⁵ *Id.* at 6.

¹⁶ MWPL Resp., Davis Decl. ¶ 11.

¹⁷ *Id.*

¹⁸ *Id.* ¶ 12.

¹⁹ *Id.*

²⁰ MWPL Resp. at 5; Davis Decl. ¶ 12.

²¹ MWPL Resp. at 5-6; Davis Decl. ¶ 13 (MWPL “did not take Ms. Gardner’s suggestion.”).

1 The Committee asserts that Gardner was a campaign volunteer but “did not play any
2 significant role in the campaign,” and that she was not an agent of or authorized by Quist or the
3 Committee to act for them regarding the insert.²² The Committee further states that neither
4 Quist, the Committee, nor an agent of either coordinated with Davis or any other party involved
5 with the creation or dissemination of the insert.²³

6 The Act defines a contribution as “any gift, subscription, loan, advance, or deposit of
7 money or anything of value made by any person for the purpose of influencing any election for
8 Federal office.”²⁴ The term “anything of value” includes all in-kind contributions.²⁵
9 Expenditures that are coordinated with a candidate are treated as contributions to the candidate.²⁶

10 For purposes of the Act, “coordinated” means made in cooperation, consultation, or
11 concert with, or at the request or suggestion of, a candidate or a candidate’s authorized
12 committee.²⁷ The Commission’s regulations provide a three-part test for determining when a
13 communication is a coordinated expenditure, which is treated as an in-kind contribution.²⁸
14 The communication must: (1) be paid for by a third party; (2) satisfy one of five “content”
15 standards listed in 11 C.F.R. § 109.21(c); and (3) satisfy one of six “conduct” standards listed in
16 11 C.F.R. § 109.21(d).²⁹ All three prongs must be satisfied for a communication to be

²² Committee Resp. at 3, 5 (July 20, 2017).

²³ *Id.* at 3.

²⁴ 52 U.S.C. § 30101(8)(A).

²⁵ 11 C.F.R. § 100.52(d)(1).

²⁶ 52 U.S.C. § 30116(a)(7)(B).

²⁷ 11 C.F.R. § 109.20(a); *see also* 52 U.S.C. § 30116(a)(7)(B)(i).

²⁸ 11 C.F.R. § 109.21(a)-(b).

²⁹ *Id.*

1 considered coordinated.³⁰ MWPL does not challenge that the payment and content elements are
2 satisfied.

3 Three conduct standards³¹ may be relevant here: "request or suggestion" is satisfied if
4 the communication is created, produced, or distributed at the request or suggestion of the
5 candidate or authorized committee or the candidate or authorized committee assents to the
6 payor's suggestion regarding the communication;³² "material involvement" is satisfied if a
7 candidate or authorized committee is materially involved in decisions regarding the intended
8 audience for the communication or the means or mode of the communication or the specific
9 media outlet used for the communication;³³ and "substantial discussion" is satisfied if the
10 candidate or committee conveyed to the payor of a communication information about the
11 candidate's plans, projects, activities, or needs, and that information is material to the
12 communication's creation, production, or distribution.³⁴

13 The available information about Quist volunteer Gardner indicates that she hosted a
14 fundraiser and may have performed additional volunteer work for the Committee.³⁵ While
15 speaking with Davis about making a contribution, Gardner, who lives near Davis, suggested that
16 MWPL's insert should be disseminated in Great Falls. This available information does not
17 indicate that Gardner was an agent of the candidate or committee such that her comment could

³⁰ *Id.*; see also Explanation and Justification, *Coordinated and Independent Expenditures*, 68 Fed. Reg. 421, 453 (Jan. 3, 2003).

³¹ The six types of conduct that satisfy the conduct standard are: (1) request or suggestion; (2) material involvement; (3) substantial discussion; (4) common vendor; (5) former employee; and (6) republication. 11 C.F.R. § 109.21(d).

³² 11 C.F.R. § 109.21(d)(1).

³³ 11 C.F.R. § 109.21(d)(2)(ii-iv).

³⁴ 11 C.F.R. § 109.21(d)(3).

³⁵ Committee Resp. at 3; see also Davis Decl. ¶¶ 11-12.

1 be imputed to Quist or the Committee.³⁶ The Committee states that no communication Gardner
2 had with Davis or with anyone regarding the insert was authorized by Quist or the Committee,
3 and we have no information to the contrary.³⁷ Further, MWPL did not disseminate the insert as
4 Gardner suggested. Thus, it does not appear that the “request or suggestion” standard of the
5 conduct prong is satisfied here.

6 The “material involvement” and “substantial discussion” conduct standards both rely on
7 materiality, that is, involvement in decision-making regarding a communication or conveying
8 information that is materially important to that communication. The conversation between Davis
9 and Gardner does not appear to satisfy either materiality requirement. The Commission has
10 explained that being “materially involved in decisions” and “material for purposes of the
11 substantial discussion standard” does not encompass all interactions, only those that are
12 important to the communication.³⁸ Although discussions about a communication’s
13 dissemination could satisfy the conduct prong,³⁹ Davis attests that the Committee disseminated
14 the insert in Bozeman and Kalispell “based on our available budget and our own internal
15 discussions,”⁴⁰ and we have no information to the contrary. Further, the insert did not run in
16 Great Falls, where Gardner recommended, which bolsters the conclusion that Gardner’s

³⁶ See 11 C.F.R. § 109.3 (defining agent as “any person who has actual authority, either express or implied,” to engage in listed activities).

³⁷ Committee Resp. at 3, 5 (Gardner did not have authority). Gardner does not appear to have ever been paid by the Committee, according to its disclosure reports. Publicly available information identifies Gardner as a music promoter; she co-hosted an event on April 18, 2017, benefitting Quist. See www.facebook.com/mightyfinetime (April 8, 2017 post).

³⁸ Explanation and Justification for Regulations on Coordinated and Independent Expenditures, 68 Fed. Reg. 421, 433-34 (Feb. 3, 2003) (“E&J”).

³⁹ For example, if a candidate informed a third-party payor about its plans to run an ad on a certain television station at a certain time, and then the payor schedules its ads to complement the candidate’s schedule, there is an inference of material involvement. See E&J at 434.

⁴⁰ MWPL Resp., Davis Decl. ¶ 13.

1 comments were not material to the Committee's decision-making or communications strategy.
2 Moreover, as described above, the available information does not suggest that an agency
3 relationship existed between Gardner and Quist or the Committee.⁴¹ Thus, it appears that
4 Gardner was not involved in decision-making regarding, nor conveyed information that was
5 materially important to, the communication. Therefore, we recommend that the Commission
6 find no reason to believe that MWPL made, or that the Committee accepted, an excessive
7 contribution in the form of a coordinated communication.

8 **C. Alleged Reporting and Disclaimer Violations**

9 The Complaint alleges that Respondents violated several reporting provisions of the Act,
10 including that the individual Respondents failed to register as a political committee and disclose
11 their contributors, file an independent expenditure report, and include a proper disclaimer on the
12 insert.⁴² MWPL acknowledges that it may have filed its Statement of Organization ("SOO") and

⁴¹ See Committee Resp. at 5 (Gardner did not have authority); Davis Decl. ¶ 12 (Gardner did not indicate that she was acting on behalf of Quist or Committee).

⁴² Compl. at 2-6.

1 Independent Expenditure Report late, but stresses that it is a small, new committee, and it
2 attempted to comply with the Act and regulations.⁴³

3 1. Statement of Organization

4 Committees such as MWPL have 10 days to file a SOO after becoming a political
5 committee within the meaning of the Act.⁴⁴ MWPL registered with the Commission on May 22,
6 2017, the day after the insert ran and two days before the Complaint was filed. MWPL received
7 \$1,500 in contributions by May 3, 2017.⁴⁵ Thus, MWPL's SOO was due by May 13, 2017, and
8 MWPL filed it nine days late. Although MWPL appears to have filed its SOO late, the late filing
9 did not cause MWPL to file any disclosure report late.⁴⁶ Thus, we recommend that the
10 Commission exercise its prosecutorial discretion and dismiss the allegation that MWPL violated
11 52 U.S.C. § 30103(a) by untimely filing its SOO.⁴⁷

⁴³ MWPL Resp. at 6-7. MWPL alternatively argues that it may not have needed to register as a political committee because its major purpose is not the nomination or election of a federal candidate. *See id.* at 6. The Act and Commission regulations define a "political committee" as "any committee, club, association or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year." 52 U.S.C. § 30101(4)(A); 11 C.F.R. § 100.5. In *Buckley v. Valeo*, the Supreme Court held that defining political committee status "only in terms of the annual amount of 'contributions' and 'expenditures'" might be overbroad, reaching "groups engaged purely in issue discussion." 424 U.S. 1, 79 (1976). To cure that infirmity, the Court concluded that the term "political committee" "need only encompass organizations that are under the control of a candidate or the *major purpose of which is the nomination or election of a candidate.*" *Id.* (emphasis added). MWPL's materials, however, indicate that its major purpose was the election of Quist. MWPL's insert contains express advocacy, and its IE Report discloses that the insert supported Quist. And MWPL's website states on its homepage, "Our story ... Montana writers speaking out in favor of protecting public lands to support Democratic candidate Rob Quist in Montana's May 25th special election." *See* www.wetakeourstand.org. In addition, MWPL's website does not show activity since the May 2017 election, further suggesting that Quist's election was its major activity.

⁴⁴ 52 U.S.C. § 30103(a).

⁴⁵ *See* MWPL 30-Day Post-Election Report at 6, 8.

⁴⁶ *See, e.g.*, MUR 6815 (Scott Brown) (Commission dismissed allegation that Statements of Candidacy and Organization were late where first required disclosure report would have been the same and was timely filed); MUR 6533 (Perry Haney) (same regarding Statement of Candidacy).

⁴⁷ *Heckler v. Chaney*, 470 U.S. 821 (1985).

1 2. Independent Expenditure Report

2 An independent expenditure is an expenditure that expressly advocates the election or
3 defeat of a clearly identified federal candidate, and is not made in concert or cooperation with or
4 at the request or suggestion of such candidate, the candidate's authorized political committee, or
5 their agents.⁴⁸ The insert, which explicitly urges voters to elect Quist, contains express advocacy
6 under 11 C.F.R. § 100.22(a).⁴⁹ In addition to a political committee's regular reporting
7 obligations, the Act further requires additional independent expenditure reporting within
8 24 hours of the expenditure when a person makes or contracts to make independent expenditures
9 aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the date of an
10 election.⁵⁰

11 The available information indicates that the insert was not timely disclosed on a 24-Hour
12 Independent Expenditure Report.⁵¹ MWPL disseminated the insert on May 21, 2017, but did not
13 file an Independent Expenditure Report until June 24. MWPL admits that the filing was late.⁵²
14 Although MWPL filed its Independent Expenditure Report late and after the election, we

⁴⁸ 52 U.S.C. § 30101(17); *see also* 11 C.F.R. § 100.22(a), (b) (definition of "expressly advocating"). The insert contains what appears to be Section 100.22(a) express advocacy.

⁴⁹ *See* Insert at 17 ("Veterans for Rob Quist"... "Our key battle today is to elect Rob Quist to Congress.").

⁵⁰ *See* 52 U.S.C. § 30104(g); 11 C.F.R. § 109.10(d).

⁵¹ Compl. at 6.

⁵² MWPL Resp. at 7.

1 nevertheless recommend that the Commission dismiss this violation based on the relatively
2 modest activity at issue and caution the Committee.⁵³

3 3. Disclaimer

4 The Complaint further alleges that the insert failed to include a proper disclaimer.⁵⁴
5 MWPL does not specifically address this allegation, although it notes that its website address
6 appears on every page of the ad.⁵⁵

7 The Act and regulations require disclaimers on public communications by political
8 committees.⁵⁶ Communications that are not authorized by a candidate are required to clearly
9 state the name and street address, telephone number, or web address of the person who paid for
10 the communication, and to state that the communication was not authorized by any candidate or
11 candidate's committee.⁵⁷ The disclaimer must be of sufficient type size and in a printed box set
12 apart from the rest of the communication.⁵⁸

13 Although MWPL's insert includes MWPL's website address on every page, there is no
14 statement that the insert was not authorized by any candidate or candidate's committee, and the

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Further, the Reports Analysis Division (RAD) refers late-filed independent expenditure reports only where to the Alternative Dispute Resolution Office or to the Office of General Counsel. See RAD Review and Referral Procedures for the 2017-18 Election Cycle, Standard 7.

54 Compl. at 5.

55 MWPL Resp. at 2.

56 52 U.S.C. § 30120(a), (c); 11 C.F.R. § 110.11(a)-(c). Although MWPL had not yet filed its SOO when it disseminated the insert, it had attained political committee status approximately three weeks earlier. See *supra* at 10. Even if MWPL was not a political committee at the time of the insert, the insert would still have required a disclaimer because it is a public communication that expressly advocates the election of Quist. See 52 U.S.C. § 30120(a); 11 C.F.R. § 110.11(a)(2).

57 52 U.S.C. § 30120(a)(3); 11 C.F.R. § 110.11(b)(3).

58 52 U.S.C. § 30120(c); 11 C.F.R. § 110.11(b)(1), (c)(1), and (2).

1 website address is not contained in a printed box set apart from the rest of the communication.

2 Thus, MWPL has violated the Act and regulations by failing to include a complete disclaimer.

3 Nevertheless, we recommend that the Commission dismiss this allegation with a caution.

4 In a number of past matters, the Commission did not pursue disclaimer violations where the
5 disclaimer was incomplete but contained sufficient information to identify the entity responsible
6 for it.⁵⁹ Here, MWPL's name is on the first page of the insert and its website address is printed
7 on every page.

8 **D. Individual Respondents**

9 The Complaint appears to allege that the 93 individual Respondents failed to disclose
10 their in-kind contributions — essays, poems, and photographs — to the Committee.⁶⁰ The
11 Complaint asserts that these contributions were anonymous or excessive.⁶¹ MWPL and the
12 individual Respondents who submitted pieces for the insert (collectively "Artist Respondents")
13 assert that the Artist Respondents' submissions were not contributions because the Artist
14 Respondents were not paid for them.⁶² It appears that these Artist Respondents did not make
15 contributions to MWPL because the value of services provided without compensation by any
16 individual who volunteers on behalf of a political committee is not a contribution under the
17 Act.⁶³ As to the individual Respondents who made direct contributions, it does not appear that

⁵⁹ See, e.g., MUR 6683 (Fort Bend County Democratic Party) (dismissing disclaimer violation and sending caution letter where disclaimer was incomplete but contained some information identifying the payor). Like MWPL, which spent \$9,237 on the insert, the MUR 6683 respondent spent a modest amount on the communication at issue. Factual & Legal Analysis at 6-7, MUR 6683.

⁶⁰ Compl. at 5.

⁶¹ *Id.* at 3-4.

⁶² MWPL Resp. at 2; see also Artist Respondent Responses.

⁶³ See 52 U.S.C. § 30101(8)(B)(i); see also Factual & Legal Analysis at 2-3, MURs 5987, 5995 & 6015 (Sir Elton John) (Musical artist's uncompensated performance at Clinton fundraiser was not a contribution).

1 such individual contributors have a reporting obligation under the Act, and a review of MWPL's
2 disclosure report indicates that none of the direct contributions were excessive.⁶⁴

3 Therefore, we recommend that the Commission find no reason to believe that the
4 individual Respondents violated the Act.

5 **III. RECOMMENDATIONS**

- 6 1. Find no reason to believe that Montana Writers for Public Lands and Rick Bass in
7 his official capacity as treasurer violated 52 U.S.C. §§ 30104(b) and 30116(a);
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9 2. Find no reason to believe that Rob Quist and Rob Quist for Montana and Linda
10 Howard in her official capacity as treasurer violated 52 U.S.C. § 30116(f);
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12 3. Dismiss the allegations that Montana Writers for Public Lands and Rick Bass in
13 his official capacity as treasurer violated 52 U.S.C. §§ 30103(a), 30104(g), and
14 30120(a), (c), and send a letter of caution;
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16 4. Find no reason to believe that the individual Respondents violated the Act;
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18 5. Approve the attached Factual and Legal Analysis;
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20 6. Approve the appropriate letters; and
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22 7. Close the file.

23
24 Lisa J. Stevenson
25 Acting General Counsel
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28 Kathleen M. Guith
29 Associate General Counsel

⁶⁴ See *supra* at 4. To the extent the Complaint alleges that MWPL may have failed to disclose its contributors, in fact, MWPL timely disclosed its contributors in a 30-day Post-Election Report. See 30-Day Post Election Report.

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Date: 12.7.17

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1-0100211-1-0001